From: "kanderson@nofanj.org%inter2" <kanderson@nofanj.org>
Subject: Farm Bill 2007 Official Comments - 12/30/2005 04:25 PM CST

Date Sent: 12/30/2005 04:25:29 CST **Date Received:** 12/30/2005 04:26:05 CST

Email: kanderson@nofanj.org

FirstName: Karen LastName: Anderson Address1: PO Box 886

Address2:

City: Pennington State: New Jersey zipcode: 08534

Question1: Agricultural land values are a key barrier to new farm enterprise creation, which in turn affects the viability of the American agricultural sector. In the Northeast and other rapidly urbanizing and suburbanizing areas drives the value of land up in excess of its agricultural production value. It is essential that the next farm bill aggressively address the need to permanently preserve our best agricultural lands for agricultural production through increased funding for the Farm and Ranchland Preservation Program.

High land prices, however, are not the only barrier faced by new farmers. There is insufficient support for new farmers support in the research and extension system, The situation is especially grim for non-traditional farmers (women, minorities, immigrants, part-time, non-legacy and the mature) who are not viewed as ?real? farmers. Current USDA programs that reach out to these underserved populations should be expanded.

Question2: We must stop perpetuating a system in which we ?compete? with products subsidized by the American taxpayer. This is a distortion of a free market. We should be emphasizing areas where we can create or maintain a fair competitive advantage, such as identity-preserved products. The USDA should continue to support certification and accreditation programs that are often pre-requisites for access to global markets. For example, the current cost-share for organic certification should be retained, and should be expanded to include other labels on a trial basis. In addition, ISO 65 conformance should be required of all USDA accreditation programs to reduce the expense of dual ISO/NOP accreditation currently borne by third party organic certifiers accredited by the USDA and potentially by other USDA-accredited certification agents working in other labeling programs.

In addition, we must address the problems created by widespread contamination of seed stock by GE seed which will create access issues far into the future, and will only get worse if pharmaceutical modifications are allowed in traditional food crops. Manufacturers must be liable for genetic trespass.

Question3: ?Distributing money to producers? is a strategy, not a goal; it would be easier to answer this question if it was asked within the context of specific goal. The five goals outlined in the USDA strategic plan can provide a strong framework for designing programs that encourage producers, processors and rural enterprises to engage in activities that advance or achieve those goals. It would be nice to see some of the outcome assessment & evaluation rigor applied to USDA grant programs to 2007 farm bill programs.

In addition, the farm bill must recognize?as indeed the USDA strategic plan does?that producers are not the only stakeholders here.

Conservation, rural places, the community of those who eat (!) are all deeply affected by the structure of the farm bill and the funding levels established for farm bill programs. Efficiency and fairness within farm bill program should include an examination of how the needs of these constituencies are served. The central question is not whether producers are getting their fair share, but of what we are buying with our tax dollars.

Question4: The locally-led conservation approach, instituted in the 1990 Farm Bill, must be strengthened to allow for greater local leadership and priority setting. Conservation and environmental payments should not subsidize intense, industrial-scale agricultural operations nor encourage expansion of intense operations. The Conservation Security Program needs to be fully implemented as a mandatory entitlement, and it needs to be simplified. The current program is overly complex. Question5: USDA programs must encourage a highly diversified, diffused food and agriculture system. This will be the most resilient as we face global economic, climactic and political challenges. Question6: The value-added grant program needs to be expanded. Ideally, funding for bio-fuel projects would be handled in a separate funding pool (ideally funded jointly with the Department of Energy) to encourage development of non-energy projects. Check-off programs should be voluntary, and new programs should be developed which support cooperative marketing of regional or production-practice based (such as organic) products. Farmers markets and other direct-to-consumer activities must be supported.

Research and Extension must continue to be funded through state-level allocations, but the formula must be revised to recognize criteria aside from ?land-in-farms? to ensure that resources are available to serve the needs of the population in food and nutrition education, conservation activities and other ?non-producer? areas. Currently, states with a highly diversified or high-value/low acreage agriculture base are significantly disadvantaged.

Research funding must be increased for areas such as organic which have the potential to address multiple goals and which show great promise. For example, the Organic Research Title needs to be funded at almost twice its current level to satisfy relative interest at the land grant and to reflect its current rapid growth.

At the same time, special consideration must be given to funding research in important areas of public health and nutrition, plant breeding and non-chemical agricultural practices (such as crop rotation) where there is little commercial incentive for research and development. Research in the public interest, without the incentive of commercialization and intellectual property, should receive special attention from the USDA in the next farm bill or it will languish altogether.